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To: Calvin Terada/R10/USEPA/US@EPA
cc:
Subject: Quil Ceda Village Treated Effluent Infiltration System, Tulalip

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Calvin, I spent some time going over the subject report over the last week. Overall, they did a good job from my perspective in analyzing the soils in the area, groundwater table, where it is, which way it is flowing and in trying to assess groundwater mounding potential. This UIC request appears to cover 250,000-gallons/day of effluent, which will be sufficient up to 2006, when they expect to begin to exceed 250,000-gallons/day.

Based on the drainfield layout plan, it appears that they have provided a workable design that should adequately dispose of effluent as planned. My concerns for this size of venture is to have a workable "Plan B" should things not work as expected. Section 5 covers the proposed Monitoring Program and Section 8 of the report covers their contingency plans, which is good. Recommend that these sections be incorporated into any approvals as a UIC device to insure that the tribe follows through with monitoring the system. EPA should request as part of the approval, reports as to how the system is performing on an annual basis to include all data collected so that you can assess whether or not the original assumptions are being met or exceeded.

In the future, flows will increase and it appears that the tribe will pursue surface discharge or discharge to the Puget Sound.

Hope this helps, RAD.